



201-15140

Functional Chemicals

March 10, 2004

Michael O. Leavitt, Administrator
US Environmental Protection Agency
Attention: Chemical Right-To-Know Program
P. O. Box 1473
Merrifield, VA 22116

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re: High Production Volume (HPV) Challenge Program
Orphan Chemicals
CAS No. 56803-37-3; Phosphoric acid, (1,1-dimethylethyl)phenyl
diphenyl ester
CAS No. 65652-41-7; Phosphoric acid, bis(1,1-dimethylethyl)phenyl
diphenyl ester

Akzo Nobel Functional Chemicals LLC, Phosphorus Chemicals hereby
certifies that the following Orphan Chemicals are components of
CAS No. 220352-35-2 BUTYLATED TRIPHENYL PHOSPHATE and thus should not
be included in the HPV Challenge Program:

CAS No. 56803-37-3; Phosphoric acid, (1,1-dimethylethyl)phenyl
diphenyl ester
CAS No. 65652-41-7; Phosphoric acid, bis(1,1-dimethylethyl)phenyl
diphenyl ester

BUTYLATED TRIPHENYL PHOSPHATE, CAS No. 220352-35-2, was sponsored for
the HPV program in July, 2001 when robust summaries and test plans were
filed.

Please direct any comments regarding these substances to
William F. Gentit
telephone 914/674-5394
william.gentit@akzonobel-chemicals.com

Very truly yours,

William F. Gentit
Manager, Regulatory Affairs

c. M. Buczek - Akzo Nobel Functional Chemicals LLC

Akzo Nobel Functional Chemicals LLC
5 Livingstone Avenue
Dobbs Ferry, New York 10522-3407
Tel. (914) 674 5000
Fax (914) 693 4487